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*Wynn Resorts, Limited and Wynn Las Vegas, LLC*

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

JUDY DOE NO. 1, an individual; JUDY DOE  
NO. 2, an individual; JUDY DOE NO. 3, an  
individual; JUDY DOE NO. 4, an individual;  
JUDY DOE NO. 5, an individual; JUDY DOE  
NO. 6, an individual; JUDY DOE NO. 7, an  
individual; JUDY DOE NO. 8, an individual;  
and JUDY DOE NO. 9, an individual,

Plaintiffs,

vs.

WYNN RESORTS, LIMITED, a Nevada  
corporation; WYNN LAS VEGAS, LLC,  
ability company; DOES I through X; and ROE  
CORPORATIONS I through X, inclusive,

Defendants.

Case No.

**NOTICE TO FEDERAL COURT OF  
REMOVAL OF CIVIL ACTION FROM  
STATE COURT**

Pursuant to 28 U.S.C. § 1332(d), Defendants hereby notify the Court of the removal of  
*JUDY DOE NO. 1, an individual; JUDY DOE NO. 2, an individual; JUDY DOE NO. 3, an*  
*individual; JUDY DOE NO. 4, an individual; JUDY DOE NO. 5, an individual; JUDY DOE NO.*  
*6, an individual; JUDY DOE NO. 7, an individual; JUDY DOE NO. 8, an individual; and JUDY*  
*DOE NO. 9, an individual, v. WYNN RESORTS, LIMITED, a Nevada corporation; WYNN LAS*  
*VEGAS, LLC, ability company; DOES I through X; and ROE CORPORATIONS I through X,*

1 *inclusive*, Case No. A-19-802786-C, which was filed in the Eighth Judicial District Court in Clark  
2 County, Nevada. In support of said removal, Defendants state as follows:

3 1. On September 30, 2019, an action was commenced in the Eighth Judicial District  
4 Court of Clark County, Nevada, entitled *JUDY DOE NO. 1, an individual; JUDY DOE NO. 2, an*  
5 *individual; JUDY DOE NO. 3, an individual; JUDY DOE NO. 4, an individual; JUDY DOE NO.*  
6 *5, an individual; JUDY DOE NO. 6, an individual; JUDY DOE NO. 7, an individual; JUDY DOE*  
7 *NO. 8, an individual; and JUDY DOE NO. 9, an individual, v. WYNN RESORTS, LIMITED, a*  
8 *Nevada corporation; WYNN LAS VEGAS, LLC, ability company; DOES I through X; and ROE*  
9 *CORPORATIONS I through X, inclusive.*. A copy of the Complaint is attached hereto as **Exhibit**  
10 **A**.

11 2. Defendants were served on October 8, 2019 with a copy of the Complaint and a  
12 Summons issued by the state court on or about October 3, 2019. A copy of the Summons is  
13 attached hereto as **Exhibit B**.

14 3. This action is properly removed to federal court under federal question jurisdiction  
15 because Plaintiff's Complaint contains claims which arise under federal law, specifically, Title  
16 VII of the Civil Rights Act of 1964, 42 U.S.C. § 2000e. *See* 28 U.S.C. § 1441.

17 4. This Notice of Removal is being filed within thirty (30) days of receipt of any  
18 pleadings setting forth the claim for relief upon which the action is based and is, therefore, timely  
19 under 28 U.S.C. § 1331 and § 1446(b).

20 5. This action is a civil action of which this Court has original jurisdiction under 28  
21 U.S.C. § 1331, and is one which may be removed to this court pursuant to the provisions of 28  
22 U.S.C. § 1441(a), in that it is a civil action arising under the Constitution, laws, or treaties of the  
23 United States. Specifically, Plaintiff alleges conduct in violation of the Title VII of the Civil  
24 Rights Act of 1964, 42 U.S.C. § 2000e. Any remaining state law claims are also properly  
25 removed pursuant to the Court's supplemental jurisdiction. 28 U.S.C. § 1367(a).

26 6. Venue is proper in this Court as this is the court for the district and division  
27 embracing the place where the action is pending in state court. 28 U.S.C. § 1391.

1 WHEREFORE, Defendants pray that the above-referenced action now pending in the  
2 Eighth Judicial District Court of the State of Nevada in and for the County of Clark be removed  
3 therefrom to this Court.

4 Dated this 29<sup>th</sup> day of October, 2019.

5 JACKSON LEWIS P.C.

6  
7 /s/ Deverie J. Christensen  
8 Deverie J. Christensen, Bar #5837  
9 Joshua A. Sliker, Bar #12493  
10 Daniel I. Aquino, Bar #12682  
11 300 S. Fourth Street, Suite 900  
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13 *Attorneys for Defendants*  
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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that I am an employee of Jackson Lewis P.C., and that on this 29th day of October, 2019, I caused to be served via the Court's CM/ECF Filing, a true and correct copy of the above foregoing **NOTICE TO FEDERAL COURT OF REMOVAL OF CIVIL ACTION FROM STATE COURT** properly addressed to the following:

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*Attorneys for Plaintiffs*

/s/ Kelley Chandler  
Employee of Jackson Lewis P.C.

4852-8064-5034, v. 1